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December 30, 2016

Hon. Brian M. Cogan  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Ibrahim Suleiman Adnan Adam Harun  
Ind. 12 Cr. 134 (BMC)

Dear Judge Cogan:

Susan Kellman, Joshua Dratel, and I represent Adnan Harun in the above-referenced matter. I write to inform the Court that, having completed a review of the relevant records and having conducted two interviews with the defendant, our expert, Jess Ghannam, has informed us that it is his opinion that Mr. Harun is not competent to proceed to trial. Because Mr. Ghannam's report contains personal and medical information, a copy has been submitted along with this letter under seal. In light of Mr. Ghannam's findings, we request that a hearing be held, pursuant to 18 U.S.C. § 4241(a), to determine whether Mr. Harun is competent to proceed to trial.

If you have any questions regarding this application please contact my office.

Respectfully submitted,



David Stern